

**United States Court of Appeals
for the District of Columbia Circuit**

No. 24-1113

(and Consolidated Cases 24-1130 & 24-1183)

TIKTOK INC. and BYTEDANCE LTD.,

Petitioners,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

(For Continuation of Caption See Inside Cover)

*On Petition for Review of Constitutionality of the Protecting
Americans from Foreign Adversary Controlled Applications Act*

**NOTICE OF INTENT OF *AMICI CURIAE* SOCIAL AND RACIAL
JUSTICE COMMUNITY NONPROFITS TO FILE AN AMICUS BRIEF IN
SUPPORT OF PETITIONERS**

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June 26, 2024

BRIAN FIREBAUGH, *et al.*,

Petitioners,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

BASED POLITICS INC.,

Petitioner,

v.

MERRICK B. GARLAND, in his official capacity as
Attorney General of the United States,

Respondent.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, amici Arizona Asian American Native Hawaiian and Pacific Islander for Equity Coalition, Asian American Federation, Asian Americans Advancing Justice Southern California, Calos Coalition, Hispanic Heritage Foundation, Muslim Public Affairs Council, Native Realities, OCA-Asian Pacific American Advocates of Greater Seattle, OCA-Asian Pacific American Advocates: San Francisco, Sadhana, Sikh Coalition, and South Asian Legal Defense Fund state that they have no parent corporations and that no publicly held entity owns ten percent (10%) or more of any amicus organization.

NOTICE OF INTENT TO FILE AMICUS BRIEF

Pursuant to Fed. R. App. P. 29(a), D.C. Circuit Rule 29(b), amici curiae Arizona Asian American Native Hawaiian and Pacific Islander for Equity Coalition, Asian American Federation, Asian Americans Advancing Justice Southern California, Calos Coalition, Hispanic Heritage Foundation, Muslim Public Affairs Council, Native Realities, OCA-Asian Pacific American Advocates of Greater Seattle, OCA-Asian Pacific American Advocates: San Francisco, Sadhana, Sikh Coalition, and South Asian Legal Defense Fund (together, “amici”), represent that they intend to participate in this case as amici curiae. Petitioners and Respondents have consented to the filing of this amicus brief.

Amici are grassroots social and racial justice nonprofits. Many amici rely on TikTok as an important social media platform for fostering solidarity and engagement in and among marginalized groups; educating, building awareness, and disseminating news affecting these groups; dismantling biases, discrimination, and dehumanization involving race, ethnicity, gender/sexual orientation, immigration status, and religion; challenging falsehoods and disinformation; freely practicing their faith; organizing politically to bolster democracy; and promoting

laws, policies, and practices that advance civil liberties and freedoms for all. All amici represent communities that use TikTok for these purposes.

Amici respectfully submit that this notice is timely filed under D.C. Circuit Rule 29(b). Amici intend to file their brief no later than June 27, 2024 in accordance with D.C. Circuit Rule 29(c).

Pursuant to D.C. Circuit Rule 29(d), amici certify they are not aware of any other amicus brief addressing the subject of this brief—in particular, representing social and racial justice community nonprofits who value TikTok as a unique platform for First Amendment-protected expression by diverse groups and who harbor grave concerns about anti-Asian animus undergirding the TikTok Ban. A separate brief is necessary to permit amici joining this brief to offer their perspectives on the issues before the Court.

Dated: June 26, 2024

/s/ Matt K. Nguyen

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*Counsel for Amici Curiae Social and
Racial Justice Community Nonprofits*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2024, I caused true and correct copies of the foregoing *Notice of Intent of Amici Curiae Social and Racial Justice Community Nonprofits to File an Amicus Brief in Support of Petitioners* to be served via electronic mail upon all counsel of record, via the Court's ECF system.

/s/ Matt K. Nguyen

Matt K. Nguyen